

**UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MASSACHUSETTS**

IN RE: PHARMACEUTICAL INDUSTRY )	MDL No. 1456
AVERAGE WHOLESALE PRICE )	
LITIGATION )	Master File No. 01-CV-12257
_____ )	
THIS DOCUMENT RELATES TO: )	Judge Patti B. Saris
)	Chief Mag. Judge Marianne B. Bowler
)	
ALL ACTIONS )	
)	
)	
_____ )	

**MOTION TO ADMIT THOMAS F. FITZGERALD,  
MICHAEL J. PRAME, AND LARS C. GOLUMBIC *PRO HAC VICE* ON BEHALF  
OF UNITEDHEALTHCARE, INC. AND UNITED HEALTHCARE INSURANCE CO.**

Pursuant to Local Rule 83.5.3, the undersigned counsel hereby move that Thomas F. Fitzgerald, Michael J. Prame, and Lars C. Golumbic of Groom Law Group, Chartered, 1701 Pennsylvania Avenue, N.W., Washington, D.C. 20006, Tel: 202-857-0620, Fax: 202-659-4503, be permitted to appear and participate in this action *pro hac vice* as counsel for third parties UnitedHealthcare, Inc. and United HealthCare Insurance Company, in association with the law firm of Manchel & Brennan, P.C., by attorney Julie B. Brennan. The accompanying certificates of counsel certify that these attorneys are members in good standing of their respective bars and are familiar with the Local Rules of this Court. A check in the amount of \$150.00 is being forwarded simultaneously with this motion for these attorneys' respective admissions *pro hac vice*.

Pursuant to Local Rule 7.1(A)(2), the undersigned certifies that counsel for third parties has conferred with counsel for Defendants UnitedHealthcare, Inc. and United

Healthcare Insurance Company, and there is no objection to this Motion to Admit *Pro Hac Vice*.

WHEREFORE, the undersigned counsel respectfully moves for the admission of Thomas F. Fitzgerald, Michael J. Prame and Lars C. Golumbic to practice before this Court *pro hac vice*.

Dated: October 27, 2005

Respectfully submitted,

UNITEDHEALTHCARE, INC. &  
UNITED HEALTHCARE INS. COMPANY

By its attorneys,

/s/ Julie B. Brennan

Julie B. Brennan (BBO # 564101)  
Manchel & Brennan, P.C.  
199 Wells Avenue, Suite 301  
Newton, Massachusetts 02459  
Tel: (617) 796-8920  
Fax: (617) 796-8921